

FILED

JAN 10 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Plaintiff's Name TYLER REVELS
Prisoner No. UME087
Institutional Address SANTA RITA COUNTY JAIL
5325 BRODER BLVD.
DUBLIN, CA 94568

"AMENDED COMPLAINT"

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TYLER REVELS

(Enter your full name)

v.

MARIN COUNTY
CAPTAIN HALE - JAIL COMMANDER,
ALEKSEI RAJAMACHVILI - JAIL
NURSING SUPERVISOR, KYLE HARA
- JAIL MENTAL HEALTH SUPERVISOR

(Enter the full name(s) of all defendants in this action)

Case No. C 22-06723 JST (CPR)

(Provided by the clerk upon filing)

COMPLAINT BY A PRISONER
UNDER THE CIVIL RIGHTS ACT,
42 U.S.C. § 1983

I. Exhaustion of Administrative Remedies.

You must exhaust available administrative remedies before your claim can go forward. The court will dismiss any unexhausted claims.

- A. Place of present confinement MARIN COUNTY JAIL
- B. Is there a grievance procedure in this institution? ☒ YES ☐ NO
- C. If so, did you present the facts in your complaint for review through the grievance procedure?
☒ YES ☐ NO
- D. If your answer is YES, list the appeal number and the date and result of the appeal at each level of review. If you did not pursue any available level of appeal, explain why.

1. Informal appeal: NOT APPLICABLE

2. First formal level: NOT APPLICABLE

3. Second formal level: NOT APPLICABLE

4. Third formal level: NOT APPLICABLE

E. Is the last level to which you appealed the highest level of appeal available to you?

☐ YES

☒ NO

F. If you did not present your claim for review through the grievance procedure, explain why.

I SUBMITTED GRIEVANCES, BUT DIDNT GET TO APPEAL DUE
TO MARIN COUNTY JAIL NOT HAVING AN APPEAL SYSTEM OR
APPEAL FORMS.

II. Parties.

A. If there are additional plaintiffs besides you, write their name(s) and present address(es).

NOT APPLICABLE

B. For each defendant, provide full name, official position and place of employment.

CAPTAIN HALE, JAIL COMMANDER, MARIN COUNTY JAIL.

ALEKSEI RAJAMACHILI, JAIL NURSING SUPERVISOR, MARIN COUNTY JAIL.

KYLE HARA, JAIL MENTAL HEALTH SUPERVISOR, MARIN COUNTY JAIL.

REBECA QUEZADA, JAIL PSYCHIATRIST, MARIN COUNTY JAIL

JOSEPH BIELEFELD, JAIL NURSE PRACTITIONER, MARIN COUNTY JAIL

III. Statement of Claim.

State briefly the facts of your case. Be sure to describe how each defendant is involved and to include dates, when possible. Do not give any legal arguments or cite any cases or statutes. If you have more than one claim, each claim should be set forth in a separate numbered paragraph.

ON 08/07/2022, AT MARIN COUNTY JAIL, I WAS HOUSED IN SPECIAL HOUSING UNIT,
UPPER TIER IN CELL #19. I SUFFERED FROM SEIZURE DISORDER WHICH PRECIPITATED
FREQUENT SEIZURES. I WAS UNDER TREATMENT BY JAIL MENTAL HEALTH
STAFF FOR PTSD, ANXIETY, AND TRAUMATIC BRAIN INJURY WITH BRAIN DAMAGE, I

WAS IN MY CELL, AROUND 11:00AM I EXPERIENCED A GRAND MAL SEIZURE AND ALSO A ANXIETY ATTACK. AS WAS TYPICAL FOR ME IN SUCH SEIZURES, I LAY ON THE CELL FLOOR HAVING A GRAND MAL SEIZURE. WHILE I WAS IN MY CONDITION, POD WORKERS/INMATES OBSERVED ME HAVING A SEIZURE AND NOTIFIED THE DEPUTY ASSIGNED IN THE POD FOR THAT DAY. MULTIPLE JAIL DEPUTIES, NURSING STAFF, AND SERGEANT WERE SUMMONED. AS I RECOVERED FROM MY SEIZURE, I WENT INTO A ASTHMA ATTACK DUE TO A LACK OF OXYGEN AND HIGH BLOOD PRESSURE. VITALS WERE OBVIOUSLY INDICATING I SUFFERED FROM A SEIZURE AND ASTHMA ATTACK. IT SHOULD BE NOTED THERE WAS A 15-20 MINUTE DELAY IN GETTING ME MEDICAL CARE BEFORE JAIL OFFICIALS ARRIVED. AS MEDICAL STAFF WERE FAILING TO CONTROL MY ASTHMA ATTACK, UNKNOWN DEPUTIES GRABBED ME AS I WAS IN AND OUT OF CONSCIOUSNESS. I WAS UNABLE TO SPEAK, OR TO GET UP AND WALK DUE TO MY ASTHMA AND SEIZURE CONDITION. AS MY BLOOD PRESSURE WAS OVER 150/170, DEPUTIES BEGAN LAUGHING AND SAYING ROLL OVER AND DIE ALREADY. AS MEDICAL STAFF WERE ATTEMPTING TO GIVE ME BREATHING TREATMENTS I WAS STRUGGLING TO BREATHE, AND SHAKING UNCONTROLLABLY. AS I WAS UNABLE TO COMPLY, THE DEPUTIES CONTINUED TO LAUGH, YELL AND MAKE OBSCENE JOKES ABOUT MY CONDITION. MEDICAL STAFF REFUSED TO CALL AN AMBULANCE AND SEND ME TO HOSPITAL BECAUSE DEPUTIES WERE PLAYING THE ROLE OF GATEKEEPER AND TOLD THE NURSE I WAS FAKING, WHEN MY VITALS INDICATED I WAS HAVING A MEDICAL EMERGENCY. I WAS UNDER THE CARE OF MARIN COUNTY JAIL DURING THIS INCIDENT AND THEY WERE LIABLE FOR ME NOT HAVING A LOWER TIER, LOWER BUNK ADA CELL. THE DEFENDANTS VIOLATED MY EIGHTH AMENDMENT AND DENIED/DELAYED ME MEDICAL CARE.

IV. Relief.

Your complaint must include a request for specific relief. State briefly exactly what you want the court to do for you. Do not make legal arguments and do not cite any cases or statutes.

IMMEDIATE RELIEF FROM THE DEFENDANTS AND THEIR PLACE OF EMPLOYMENT, DUE TO THEM CONTINUOUSLY VIOLATING FEDERAL RIGHTS. A TEMPORARY RESTRAINING ORDER TO BE GRANTED AGAINST THE DEFENDANTS.

FOR MY ADA RIGHTS TO BE ENFORCED, SO I DON'T HAVE TO ENCOUNTER A LIFE THREATENING EPISODE DUE TO BEING DENIED MEDICAL CARE. TO BE APPOINTED COUNSEL, DUE TO MY PHYSICAL AND MENTAL IMPAIRMENTS TO BE RECOGNIZED AS DISABLED IN CUSTODY LIKE HOW IM HONORED AS DISABLED IN THE COMMUNITY OUT OF CUSTODY.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 12/21/2022
Date

Tyler Revels
Signature of Plaintiff

Tyler Revels, UME087
Santa Rita County Jail
5325 Brader Blvd.
DUBLIN, CA 94568
PRO SE LITIGANT



OAKLAND CA 945
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